

### **III. REMARKS**

#### **A. Status Of The Claims**

Claims 1-14, 16-24, 67-80, 82-91, 94 and 96, and 98-99 are pending. Claims 25-66, 92-93, and 95 have been previously cancelled. Claims 15, 81 and 97 have been cancelled. Claims 1, 11, 16-21, 24, 67, 77, 82-87, and 90 have been amended. No new matter is added by these amendments, and these amendments are fully supported by the specification. Applicant respectfully requests reconsideration of the rejections of these claims for at least the following reasons.

#### **B. Examiner Interviews**

Applicants would like to thank Examiner Karmis for the courtesy extended to Applicants' Representative during a series of interviews, including one on February 17, 2010 and one on April 16, 2010. During these interviews, Examiner Karmis and Applicants' Representative discussed the inclusion of the steps of "performing a consolidated receivables process to gather payment data into consolidated receivables data for a single report" and "matching the consolidated receivables data to an outstanding sub-invoice file, and providing the matched data to the seller" as well as amendments to more particularly define the invention. Although no agreements were reached, Applicants have amended the independent claims as discussed.

#### **B. Claim Rejections Under 35 U.S.C. § 103**

##### **1. Claims 1-23, 67-89, 91, 94, 96 and 97**

Claims 1-23, 67-89, 91, 94, 96 and 97 stand rejected under 35 U.S.C. 103(a) as allegedly rendered obvious by U.S. Patent No. 6,343,279 to Bissonette, et al. ("Bissonette") in view of U.S. Patent No. 5,970,475 to Barnes, et al. ("Barnes"), U.S. Patent No. 6,311,170 to Embrey and in further view of U.S. Patent No. 6,032,134 to Weissman. Applicants respectfully disagree.

In order to expedite the prosecution of the present application, Applicants have amended independent claims 1 and 67 to include the steps of “performing a consolidated receivables process to gather payment data into consolidated receivables data for a single report” and “matching the consolidated receivables data to an outstanding sub-invoice file, and providing the matched data to the seller.” Applicants submit that these elements are not disclosed in the prior art.

Further, as previously submitted, Applicants submit that Bissonette does not disclose “making the consolidated invoice available to the buying entity.” Indeed, as Bissonette does not disclose that invoices are consolidated.

Bissonette also does not disclose “receiving, at the ordering and payment allocation system an indication from the buying entity as to which of the orders a payment is approved and which orders are disputed or excepted.” Although Bissonette discloses the approval or rejection of transactions, the cited portions of Bissonette do not disclose an indication that an approved consolidated invoice that indicates which orders are approved and which are disputed or excepted is received. Therefore, this element is not disclosed by Bissonette.

Finally, Bissonette fails to disclose “allocating the portions of each of the aggregated payments to the corresponding subsidiary for which the payment has been made.” Indeed, the Office Action does not specifically allege that this element is disclosed. Instead, the Office Action only alleges that Bissonette discloses “allocating the payments using post reconciliation.” *Id.* Regardless, Bissonette does not disclose the allocation of aggregated payments. Rather, the passage cited by the Office Action refers to the authorization for payment. *See, e.g.*, Col. 14, ll. 21-26 (“In generating credit card payments and adjusting the account codes 128 the system process in a loop 620-622 (see FIG. 21) where approved entries in the credit card statements table are processed until all the

statements have been processed, *at which time the credits are processed 624 for payment authorization* and processing ends 626.”) (emphasis added). Thus, this element is also not disclosed by Bissonette.

None of Barnes, Embrey or Weissman cure the deficiencies in Bissonette. Therefore, Applicants respectfully request that the rejection on independent claim 1, and all claims dependent thereon, be withdrawn.

Independent claim 67 includes elements similar to those discussed above for claim 1. Accordingly, for similar reasons to those provided for claim 1, Applicants requests that the rejection of independent claim 67, and all claims dependent thereon, be withdrawn.

2. Claims 24 and 90

Claims 24 and 90 stand rejected under 35 U.S.C. § 103(a) as allegedly rendered obvious by Bissonette, Barnes, Embrey, Weissman, and further in view of U.S. Patent No. 5,825,003 to Jennings, et al. (“Jennings”). Applicants respectfully disagree.

Claims 24 and 90 depend on independent claims 1 and 67, respectfully, and include all limitations of these claims and any intervening claims. *See* 35 U.S.C. § 112, ¶ 4. Thus, for at least the reasons discussed above, Applicants respectfully request that the rejection of claims 24 and 90 be withdrawn.

**IV. CONCLUSION**


Applicants respectfully submit that the application is in condition for allowance. Applicants believe that no fees are necessary in connection with the filing of this document. In the event any fees are necessary, please charge such fees, including fees for any extensions of time, to the undersigned’s Deposit Account No. 50-0206. Should the Examiner believe anything further is desirable in order to place the application in even better condition for allowance, the

Examiner is invited to contact Applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

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